

U.S. ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. Washington, D.C. 20460 MANUFACTURER'S REPORT PRELIMINARY ASSESSMENT INFORMATION This information is required under the authority of Section 8(a), Toxic Substances Control Act, 15 U.S.C. 2607.	Send completed form to: Document Control Office (7407) Office of Pollution Prevention and Toxics U.S. EPA Room G-099 401 M Street, S.W. Washington, DC 20460 Attn: 8(a) PAIR Reporting	CONTROL NUMBER PERIOD COVERED FROM: Mo Yr. TO Mo Yr
---	---	---

Section I – CERTIFICATION

TECHNICAL CERTIFICATION STATEMENT I hereby certify that, to the best of my knowledge and belief, all information entered on this form is complete and accurate. I agree to permit access to, and the copying of records by, a duly authorized representative of the EPA Administrator, in accordance with the Toxic Substances Control Act, to document any information reported here.	<table style="width: 100%;"> <tr> <td style="width: 70%;">Signature</td> <td style="width: 30%;">Date</td> </tr> <tr> <td colspan="2">Name and title <i>Please print or type</i></td> </tr> </table>	Signature	Date	Name and title <i>Please print or type</i>	
Signature	Date				
Name and title <i>Please print or type</i>					

CONCERNING EPA DISCLOSURE OF INFORMATION

Any person who submits information to EPA under the Preliminary Assessment Information Rule (40 CFR 712) should be aware of EPA regulations (40 CFR Part 2) which govern disclosure of such information. Those regulations provide that such person may, if he or she desires, assert a confidentiality claim covering part or all of the information submitted. Information covered by such a claim will be publicly disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2. However, if no such claim accompanies the information when it is received, EPA may make that information public without notifying the submitter.

CONFIDENTIALITY STATEMENTS

Information disclosed to EPA on this form may be claimed confidential by marking the appropriate boxes below. The person signing the Confidentiality Certification Statement attests to the truth of the following four statements concerning all information that is claimed confidential. Note that chemical substance identity may not be claimed confidential for this rule.

1. My company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without our consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to our competitive position.

CONFIDENTIALITY CERTIFICATION STATEMENT I hereby certify that the Confidentiality Statements on this form are true as to that information below for which I have asserted a confidentiality claim.	<table style="width: 100%;"> <tr> <td style="width: 70%;">Signature</td> <td style="width: 30%;">Date</td> </tr> <tr> <td colspan="2">Name and title – <i>Please print or type</i></td> </tr> </table>	Signature	Date	Name and title – <i>Please print or type</i>	
Signature	Date				
Name and title – <i>Please print or type</i>					

Section II – CHEMICAL IDENTIFICATION

Part A CAS No. <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table> Chemical name (first 15 characters) <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table>	Part B Category name (first 15 characters) <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table> Inventory Form C number <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table>
--	--

Section III – RESPONDENT IDENTIFICATION

☐ MARK THIS BOX TO CLAIM THIS SECTION CONFIDENTIAL

Part A – Plant Site – Physical location Name <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table> Number and street <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table> City <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table> County <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table> State <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table> ZIP code <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table> Dun and Bradstreet number <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table>	Part B – Mailing Address of: <div style="display: flex; justify-content: space-between; margin-bottom: 10px;"> <input type="checkbox"/> Corporate Headquarters <input type="checkbox"/> Plant Site </div> Name <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table> Number and street <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table> City <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table> State <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table> ZIP code <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table> Dun and Bradstreet number (for corporate headquarters only) <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table>
---	--

Part C – Technical Contact Name and title <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table> Telephone (Area code/number) <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table> <div style="margin-top: 10px;"> <input type="checkbox"/> At headquarters <input type="checkbox"/> At plant site </div>	Part D – Acknowledgement EPA will send acknowledgement to – Name and title <table style="width: 100%; border-bottom: 1px solid black; height: 20px;"></table>
--	--

Section IV — PRELIMINARY ASSESSMENT INFORMATION

NOTE

Mark the box to the left of any item below to claim the answer to the item as confidential. Report all quantities in kilograms (1 kilogram = 2.2 pounds). Enter N/A for any item that does not apply to you; do not leave any blanks.

Part A — Plant Site Activities — Information in part A must be your best estimate from readily obtainable data. For items 3b, 3c, and 3d, specify the accuracy of your answers.

<input type="checkbox"/>	1. Total quantity imported	kg	<input type="checkbox"/>	2. Quantity manufactured for sale or use	kg
<input type="checkbox"/>	3a. Quantity lost during manufacture (3b + 3c + 3d must equal 3a)	kg	<input type="checkbox"/>	3c. Quantity in wastes treated to destroy the chemical	kg ± %
	3b. Quantity lost to the environment	kg ± %	<input type="checkbox"/>	3d. Quantity in wastes not treated to destroy the chemical	kg ± %
Activity (1)	Process category (2)	Quantity (kilograms) (3)	Total worker-hours (4)	Total workers (5)	
<input type="checkbox"/> 4. Manufacture of the chemical	a. Enclosed				
	b. Controlled release				
	c. Open				
<input type="checkbox"/> 5. On-site use as reactant	a. Enclosed				
	b. Controlled release				
	c. Open				
Total Quantity _____ kg					
<input type="checkbox"/> 6. On-site nonreactant use of the chemical substance	a. Enclosed				
	b. Controlled release				
	c. Open				
Total Quantity _____ kg					
<input type="checkbox"/> 7. On-site preparation of products	a. Enclosed				
	b. Controlled release				
	c. Open				
Total Quantity _____ kg					
<input type="checkbox"/> 8. MANUFACTURER'S PRODUCTS — Report the quantity of the chemical substance that you prepare for each of the following.					
INDUSTRIAL PRODUCTS (domestic)	a. Chemical or mixture	kg	CONSUMER PRODUCTS (domestic)	d. Chemical or mixture	kg
	b. Article with some release	kg		e. Article with some release	kg
	c. Article with no release	kg		f. Article with no release	kg
g. Products for export					kg
Part B — Chemical Substance Processing by Customers — Information in part B must be accurate to within ± 50%.					
<input type="checkbox"/> 9. CUSTOMERS' USES AND PRODUCTS — Estimate the quantity of the chemical substance that your customers use or prepare for each of the following.					
INDUSTRIAL PRODUCTS (domestic)	a. Chemical or mixture	kg	CONSUMER PRODUCTS (domestic)	d. Chemical or mixture	kg
	b. Article with some release	kg		e. Article with some release	kg
	c. Article with no release	kg		f. Article with no release	kg
g. Products for export					kg
h. Quantity of chemical consumed as reactant					kg
i. Unknown customer uses					kg
<input type="checkbox"/> 10. MARKET NAMES — If you report your customers' uses as unknown (9i above) for more than 20% of the total quantity of chemical substance that you manufacture and import (20% of items 1 and 2 above), list the market names under which you distribute the chemical. (If you need more space, attach an additional sheet.)					
a.		c.			
b.		d.			
<input type="checkbox"/> 11. CUSTOMERS' PROCESS CATEGORIES — Based on your knowledge of general industry practices, estimate the quantity of chemical substance that you sell to customers as the chemical and that your customers further process in each of the following categories.					
a. Enclosed processes		kg	c. Open processes		kg
b. Controlled release processes		kg	d. Unknown		kg

OMB Control No. 2070-0054
NOTICE TO SUBMITTERS

This notice is provided to submitters of EPA Form 7710-35, “Manufacturer’s Report -- Preliminary Assessment Information,” in accordance with the Paperwork Reduction Act (E.O. 2291), to disclose public reporting burden information. In additional, EPA wishes to inform submitters that the reporting requirements on EPA Form 7710-35 have not changed with this notice. For further information on Preliminary Assessment Information reporting, refer to the Code of Federal Regulations - Title 40 - Part 712.

The public reporting and record keeping burden for this collection is estimated to average 29.57 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (Mail Code 2137), 401 M Street S.W., Washington, D.C. 20460. Include the OMB control number in any correspondence, but do not submit the form or report to this address. The actual information or form should be submitted in accordance with the instructions accompanying the information or form, specified in the corresponding regulation.

SUPPLEMENTAL INSTRUCTIONS

What chemicals to report -- Do not report on listed chemical substances if these are manufactured or imported incidentally as a byproduct, non-isolated intermediate, or impurity.

A byproduct or co-product must be reported if it's marketed or used as a subject (listed) chemical.

Do not report a listed chemical substance if it is a component of a mixture (imported or manufactured). Note, though, that the mixture itself may be listed as a reportable substance. Reporting is required, however, if the chemical is manufactured separately by a given company, and then blended into a mixture. In such a case, the blending step(s) would be reported as processing activities. Reporting is also required if the manufactured or imported chemical is (1) in aqueous solution; (2) in a solution containing an additive (such as a stabilizer or other chemical) to maintain the integrity or physical form of the substance; or (3) present in any grade or purity.

Reporting -- Enter the month and year beginning and ending the 12month period for which you report, for example, July 81 -June 82. This reporting period is listed with the chemical substance in 40 CFR 712.50.

Who must report -- In addition to the actual synthesis of a compound, all refining, extracting, and purifying activities of a listed chemical substance are considered manufacturing activities under Section 3(7) of TSCA. Reporting is required for all companies involved in any of these activities.

Repackaging is considered a processing activity and should not be reported as manufacture. A company that only repackages a listed chemical substance is considered only a processor. Note, however, that if the company imports the chemical prior to repackaging it is considered a manufacturer and must report.

1. CERTIFICATION

Confidentiality certification -- You may claim information confidential by marking appropriate boxes in sections III and IV. If you claim any information confidential, you must certify that the Confidentiality Statements are true for all information claimed confidential on the form. Do this by signing and dating the Confidentiality Certification Statement. Remember: To claim confidentiality, both the appropriate box must be marked and the confidentiality certification must be signed by personnel with designated authority (e.g., general counsel or corporate office in charge).

IV. PRELIMINARY ASSESSMENT INFORMATION

TSCA Regulable Quantities -- Eliminate second sentence of second paragraph and replace with following:

If a chemical from a given manufacturing stream is solely for a non-TSCA use, no reporting is required. However, if a company produces a chemical from the same stream that will be used for both TSCA and non-TSCA purposes, the total quantity must be reported under items 4 and 5. Note that the quantity produced for TSCA purposes only is entered under item 2.

PART A: PLANT SITE ACTIVITIES

Item 1 -- **Change second sentence.**

For a given compound, if a company is not involved in any manufacturing activity, and imports a chemical at one site and processes it at another facility, answers need to be provided only for item 1 and items 9 through 11 (Part B). Note that the transfer of chemical to another site of the same company for processing

is treated as if it were a customer use.

Item 2 -- Change to:

Enter the total quantity of chemical domestically manufactured for TSCA use during the reporting period, not counting the losses reported in item 3.

PROCESS CATEGORIES

Open Process -- Change the second sentence.

Routine direct contact would be associated, for example, with reaction vessels that are open vats, the transport or storage of the chemical in open containers (even in an otherwise enclosed process), and the venting of a chemical freely into the workplace atmosphere.

WORKERS

Change the first paragraph to the following:

Report the total number of workers for each process category. Workers are counted in a process category if (1) they are directly involved in manufacturing, processing, and handling the chemical during the reporting period or (2) they are regularly assigned maintenance or inspection personnel who work with the process from a remote control room, and who do not regularly come in contact with the actual chemical stream, are not to be counted unless their exposure to the chemical stream is greater than or equal to that of regularly assigned inspection and maintenance workers. If only control room workers are associated with a process, and their exposure to the chemical stream is less than that of regularly assigned inspection and maintenance workers, the company must nevertheless report the process categories associated with the manufacture and on-site use of the chemical (column 3 in items 4 through 7). The number of workers and total worker-hours however may be listed as zero.

**QUESTIONS AND ANSWERS ABOUT REPORTING
UNDER TSCA SECTION 8(a) PRELIMINARY ASSESSMENT**

INFORMATION RULE 47 FR 2699

1. I manufacture a chemical at one company plant site and then ship it to another plant site (within the same company) where it is processed into another product. Do I separately report the activities of both plant sites?

Answer

No Report on only one form for the plant site where manufacturing actually occurs, and treat the second plant site's activities as customer activities on that form.

2. I buy a subject chemical in an impure form and purify it, package it and then sell it as a subject chemical. Should I report this activity?

Answer

Yes. Any company which extracts, refines, separates or purifies a listed chemical substance is considered to be a manufacturer for the purposes of this rule. Thus in the above example, both the company that manufactured and sold the impure subject chemical and the company that further refined it are to report as manufacturers.

3. In the process of producing a non-listed chemical substance, I produce a listed chemical substance as a "byproduct." This waste is shipped to another company plant site where the subject chemical is separated out and sold. Do I report on the byproduct?

Answer

If a company produces a chemical with commercial intent (i.e., the company does not merely intend to dispose of the chemical as waste), then that chemical is a product for purposes of the reporting rule regardless of whether that chemical was a primary or secondary product of the production stream. In the above example, the "byproduct" subject chemical is shipped to another site where it is purified and ultimately distributed commercially. This subject chemical is in fact a product, because it is ultimately put to use. The first plant site should therefore report on its production of this subject chemical, since the company considers it to be a listed chemical.

(Note: If a company produces a mixture of a subject chemical plus other substances (e.g., water) as a "byproduct" with commercial intent, and the company refers to that "byproduct" as a subject chemical during commercial sales or intra-company transfers (for commercial use), then the manufacturer should report only on the quantity of the listed chemical in the total "byproduct." In addition, reporting is not necessary if the quantity of the listed chemical is less than 500 kg.

**QUESTIONS AND ANSWERS ABOUT REPORTING
UNDER TSCA 8(A) PRELIMINARY ASSESSMENT INFORMATION
RULE**

REPORTING YEAR

1. I produce an 8(a) chemical each year from March to July. Our corporate year is from June 1 to

May 31; on which quantities should I report?

Answer

Information should be reported on the latest complete corporate fiscal year. Therefore, in the above example the company should report on the quantity of the chemical produced during the previous June 1 through July 31 period, and that quantity produced from March 1 through May 31 of this year.

2. I imported an 8(a) chemical during the 1981 fiscal year. Sometime during either that year or the next, I stopped importing the chemical. Will that make any difference in how I fill out the reporting form?

Answer

A company is to report how much of the chemical they manufactured or imported during their latest complete corporate fiscal year from the effective date of the rule. Once this period is determined, a company must report only on how much of the chemical was imported at that time. If during this period the company did not import the chemical, they are not subject to this rule.

PRODUCT IDENTIFICATION

3. Should we use the list of chemicals we reported for the TSCA Inventory to determine our reporting obligations under the section 8(a) rule?

Answer

No. All chemicals which are listed in the section 8(a) Preliminary Assessment Information Rule also appeared on the TSCA Inventory. However, the chemicals that any individual company reported for the Inventory may not dictate that company's reporting obligations under the section 8(a) reporting rule.

The Inventory contains data reported by manufacturers prior to 1977.. The section 8(a) reporting rule requires reporting on chemicals produced during a company's latest complete fiscal year (which would be later than 1980). Some companies may no longer produce chemicals that they reported for the Inventory, and thus should not report on those chemicals for the section 8(a) rule. Alternatively, some companies may now produce chemicals listed in the section 8(a) reporting rule that they did not manufacture prior to the Inventory. In this second example, the company would not have reported for the Inventory, yet would be required to report on these chemicals under the section 8(a) rule. In either case, a manufacturer's reporting obligations under the section 8(a) rule would be different from what they were at the time of the Inventory.

4. We manufacture four different products in "coke batteries." At the time of reporting for the initial TSCA inventory, EPA allowed us to use generic terms for our products instead of figuring out exactly what chemicals were in our product. We believe that in our production we produce 50 or more 8(a) chemicals as byproducts, but we are not sure. What should we do for 8(a) reporting?

Answer

Unless a chemical produced by a company is marketed as an 8(a) subject chemical, it is not reportable. The above example represents merely a product stream which contains one or more of the subject chemicals but is not marketed or used in practice as solely a subject chemical. No reports are required.

5. I buy a subject chemical in an impure form and purify it, package it and then sell it as a subject chemical. Should I report this activity?

Answer

Yes. Any company which extracts, refines, separates or purifies a listed chemical substance is considered to be a manufacturer for the purposes of this rule. Thus in the above example, both the company that manufactured and sold the impure subject chemical and the company that further refined it are to report as manufacturers.

IMPORTATION

6. If a chemical is on the TSCA section 8(a) Preliminary Assessment Information Rule, must a company report if: (i) they import it as part of an article? (ii) they import it as part of a mixture?

Answer

(i) Importers of articles are exempt from reporting.

(ii) Importers should report chemical substances imported in bulk in any grade of purity, in aqueous solution, or containing additives (such as stabilizers other chemicals) to maintain the integrity or physical form of the substance. this does not include formulated mixtures of other kinds.

7. If a company imports a chemical in bulk and then further processes it, must they report?

Answer

Yes. The company must report both on the actual importation activity and how they further process the chemical.

8. If a company imports a chemical in a container and merely repackages the chemical and sells it to someone else, is the chemical reportable?

Answer

Yes. Companies that import a chemical are considered manufacturers. Even companies which only import a chemical in bulk form for commercial purposes and do not further process it are required to report for this rule. Note that repackaging is considered a processing activity and should be reported in the appropriate part of the form.

9. We manufacture a chemical that is not on the TSCA section 8(a) list. We also produce an 8(a) chemical as a byproduct which we incinerate. Are we exempt from reporting under section 712.25(d)(1)?

Answer

Yes. If a company produces a chemical without a separate commercial intent during the manufacture of another chemical, it is producing a byproduct (see definition in section 712.3(a)). Companies which produce subject chemicals solely as unmarketed byproducts are exempt from reporting.

PROCESSING

10. If our company manufacturer an 8(a) chemical and then packages the product in a drum for sale to our customers, how do we report the packaging step?

Answer

If the chemical substance in the drum will be further processed by the customers, the packaging step is considered part of the manufacturing of the chemical and should be reported as such in Section IV, Part A, question 4. However, if the manufactured substance is not to be further processed by customers then packaging of the chemical is considered preparation of a final product for customers and should be reported in question 7.

11. Our company uses an 8(a) chemical as a reactant to make a dyestuff: After the reaction, the chemical no longer exists. For item 8 on the reporting form, does EPA want the amount of (a) the chemical before the reaction, (b) the finished product after the reaction. or (c) the 8(a) chemical after the reaction? (in this case there is no chemical remaining after the reaction.)

Answer

First, the company must also manufacture the chemical if they are to report at all. If they do manufacture a subject chemical and react it to form a new product, this reaction step should be reported in question 5. The resultant product (dyestuff) does not have to be reported. Question 8 refers to products which contain the chemical substance (and will not be further processed by customers).

REPORTING QUANTITIES

12. During the reporting period I produced 500,000 pounds of an 8(a) chemical. During that same period I processed all of the 500,000 pounds plus 200,000 pounds that was in storage from the previous year. Do I report on the additional 200,000 pounds?

Answer

Yes. In the above example, the quantity processed is 700,000 pounds.

13. It is stated in section 712.5 of the rule ("Method of identification of substances for reporting purposes") that substances that are marketed or used in aqueous solution, in the presence of an additive, or in various grades of purity are to be reported as substances, not as mixtures. Does this mean that if we produce 200,000 pounds of a subject chemical and add 1 00,000 pounds of water to it to make a solution for our customers, we should include the 1 00,000 pounds of water as a reportable quantity.

Answer

No. Only report the 200,000 pounds of the substance made and prepared. The statement in section 712.5 simply means that, in reporting, a substance conveyed in the presence of additives, or impurities, or in water is still to be classified as a substance just as it is in commercial practice.

14. My company has three plant sites which all produce the same chemical. I would like to report the quantity processed by customers (section IV, Part B) as one total on a corporate basis. Can I do this?

Answer

A company may report section IV Part B on a corporate total basis if the information is kept only on a corporate basis. IF the individual plant sites have the information, they should report it individually.

To report section IV Part B totals for all plant sites, a company must report the total figures on one form; all other plant site forms must have this section blank with the exception of question 10a. Use the space under 10a to cross reference the form containing the totals. For example, if plant site A's form (control number 808300001) is to contain all customer information for plant sites A, B, and C, then question 10a (Market Names) on the plant site form for B and C should contain the following notation:

See control number 808300001

15. If we import a subject chemical, turn it into an alloy and then form it into an electrical wire which we sell to our customers, do we report the sire or the alloy as a final product?

Answer

If a product to be sold to customers is intended to contain the subject chemical (i.e., the chemical was not previously reacted with other substances) then all steps leading to the product formulation are to be reported. Thus, in the above example, processing of the alloy is considered part of the preparation of product step (question 7), with the electrical wire representing the final product (question 8).

16. We import a subject chemical into the U.S. and then sell the chemical to various customers. We have very little information about chemical production or use. How can we report this information?

Answer

A company which imports a chemical but does not further process it should report the total quantity imported in Part A, question 1 and whatever information they can provide in Part B. If customer uses are not known to within +/-50%, report unknown in Part B.

17. I manufacture a chemical at one company plant site and then ship it to another plant site (within the same company) where it is processed into another product. Do I separately report the activities of both plant sites?

Answer

No. Report on only one form for the plant site where manufacturing actually occurs, and treat the second plant site's activities as customer activities on that form.

18. In the process of producing a non-listed chemical substance, I produce a listed chemical substance as a "byproduct." This waste is shipped to another company plant site where the subject chemical is separated out and sold. Do I report on the byproducts?

Answer

If a company produces a chemical with commercial intent (i.e., the company does not merely intend to dispose of the chemical as waste), then that chemical is a product for purposes of the reporting rule regardless of whether that chemical was a primary or secondary product of the production stream. In the above example, the "byproduct" subject chemical is shipped to another site where it is purified and ultimately distributed commercially. This subject chemical is in fact a product, because it is ultimately put to use. The first plant site should therefore report on its production of this subject chemical, since

the company considers it to be a listed chemical.

(Note: If a company produces a mixture of a subject chemical plus other substances (e.g., water) as a "byproduct" with commercial intent, and the company refers to that "byproduct" as a subject chemical during commercial sales or intra-company transfers (for commercial use), then the manufacturer should report only in the quantity of the listed chemical in the total "byproduct." In addition, reporting is not necessary if the quantity of the listed chemical is less than 500 kg.)

19. Should we use the list of chemicals we reported for the TSCA Inventory to determine our reporting obligations under the section 8(a) rule?

Answer

No. All chemicals which are listed in the section 8(a) Preliminary Assessment Information Rule also appeared on the TSCA Inventory. However, the chemicals that any individual company reported for the Inventory may not dictate that company's reporting obligations under the section 8(a) rule.

The Inventory contains data reported by manufacturers prior to 1977. The section 8(a) reporting rule requires reporting on chemicals produced during a company's latest complete fiscal year (which would be later than 1980). Some companies may no longer produce chemicals that they reported for the Inventory, and thus should not report on those chemicals for the section 8(a) rule. Alternatively, some companies may now produce chemicals listed in the section 8(a) reporting rule that they did not manufacture prior to the Inventory. In this second example, the company would not have reported for the Inventory, yet would be required to report on these chemicals under the section 8(a) rule. In either case, a manufacturer's reporting obligations under the section 8(a) rule would be different from what they were at the time of the Inventory.